

# **EXHIBIT 2**



**C. Christopher Newberg | Attorney**

Main: (616) 451-4000

Direct: (616) 930-4338

Fax: (616) 451-4114

Email: [chris@rodenhouselaw.com](mailto:chris@rodenhouselaw.com)

678 Front Ave NW, Ste 176

Grand Rapids, MI 49504

January 10, 2022

Google Ireland Limited  
c/o Custodian of Records  
Gordon House  
Barrow Street  
Dublin 4  
Ireland

***Re: DMCA Takedown Notice***

To Whom It May Concern,

I am contacting you on behalf of Dr. Mirko Avesani, an individual represented by Rodenhouse Law Group PC. This is a notice under the Digital Millennium Copyright Act of 1998 (“DMCA”), 17 USC § 512. I am the duly authorized representative of the copyright owner of the work identified below. I am writing to report an instance of copyright infringement on a website hosted by you and for which you are the service provider.

The infringing content, which can be found in a video uploaded by the “Tim Connelly” channel page, contains a copyrighted photograph owned by Dr. Avesani. The title(s) and URL(s) addresses associated with the infringing content are provided below, as are other details involving the infringement of Dr. Avesani’s intellectual property rights. Dr. Avesani demands that you immediately remove and disable access to the infringing content accessible through your website or service, in accordance with the DMCA.

Title of Infringing Video: “The coughing Doctor”

Video URL: <https://www.youtube.com/watch?v=2ORAmwJnoik>

Work(s) Infringed: Photograph of Dr. Avesani’s face superimposed over the face of another individual. Dr. Avesani’s face is the male face in the video. The photograph is apparent throughout the entire video. As indicated in the Declaration of Mirko Avesani provided with this package of documents, the photograph appearing in “The coughing Doctor” video was taken by Dr. Avesani and is owned by Dr. Avesani.

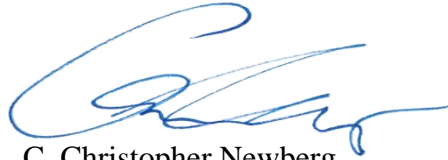
I, C. Christopher Newberg, have a good-faith belief that use of the materials described above in the manner complained of is not authorized by the copyright owner, its agent, or the law. I declare under penalty of perjury that the information in this notification is accurate and that I am the owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

This correspondence does not constitute a waiver of any right to recover damages incurred by virtue of any such unauthorized activities, and such rights, as well as claims for other relief, are expressly retained.

If you have any questions or concerns, please feel free to contact me via email at [chris@rodenhouselaw.com](mailto:chris@rodenhouselaw.com), phone at 616-451-4000, or mail at the address in the heading above.

Very truly yours,

RODENHOUSE LAW GROUP

A handwritten signature in blue ink, appearing to read 'C. Newberg', with a large, sweeping initial 'C'.

C. Christopher Newberg  
Attorney for Mirko Avesani